10:44:25 1   digress. I want to keep you focused on splicing done in

 ·44:30 2   the field with a splice case.

10:44:32 3   A.   Right.

10:44:32 4   Q.   We talked about the majority of the times

10:44:34 5   you're going to have working fibers in there.

10:44:36 6   A.   Right.

10:44:38 7   Q.   If your crew properly follows SWBT's methods

10:44:45 8   and procedures, shouldn't it be the case that they will

10:44:49 9   do their splice in a safe and controlled manner and not

10:44:53 10   affect the working fibers?

10:44:55 11   A.   Yes.

10:44:57 12   Q.   Have you done -- well, I assume over your

10:45:00 13   career you've done numerous field splices involving a

10:45:05 14   splice case, correct?

10:45:07 15   A.   Yes, sir.

10:45:08 16   Q.   Okay. Have you ever had occasion to -- how

10:45:14 17   many times -- how many splices have you done? Tens of

10:45:18 18   thousands?

10:45:19 19   A.   I wouldn't say tens of thousands. I don't

10:45:22 20   have no idea.

10:45:23 21   Q.   Thousands?

10:45:25 22   A.   I don't know.

10:45:26 23   Q.   How many did you average a day? When you were

10:45:30 24   splicing, how many splices would you do a day on

  45:32 25   average?

10:45:34 1   A.   What do you mean by splices?

·45:37 2   Q.   Per fiber splice. If you go into a manhole

10:45:40 3 and you do 14 splice -- you splice 14 fibers, that's 14

10:45:46 4 different splices, correct?

10:45:51 5   A.   You mean 14 different fibers or 14 different

10:45:54 6 locations?

10:45:55 7   Q.   No, no. You're in a single location, single

10:45:58 8 manhole --

10:45:58 9   A.   Right.

10:45:59 10   Q.   -- DWO calls for you to get down there and

10:46:03 11 splice 14 fibers together, and you do that, you have

10:46:07 12 fused 14 times, correct?

10:46:10 13   A.   Yes; sir.

10:46:10 14   Q.   You've achieved 14 splices in that manhole,

10:46:13 15 correct?

10:46:13 16   A.   Right.

10:46:14 17   Q.   On average when you were splicing, how many

10:46:17 18 splices would you do a day, 10, 20, 100?

10:46:23 19   A.   You mean in one location? Like you were

10:46:26 20 talking about, just getting in the manhole?

10:46:28 21   Q.   Well, let's start there. Per location, what

10:46:31 22 would be the average number of splices that a SWBT crew

10:46:38 23 would do?

10:46:38 24   A.   It depends on what method -- you know.

46:43 25   Q.   Fusion, fusion splicing?

10:46:48	1	A. Once you're set up in a manhole, because
46:50	2	there's more to it than just going in there and splicing
10:46:53	3	the fibers.
10:46:54	4	Q. I understand.
10:46:54	5	A. We have got to set up the work area,
10:46:57	6	protection and all that.
10:46:57	7	Q. I understand the majority of your time is
10:46:59	8	taken just setting up the manhole.
10:47:01	9	A. Right.
10:47:01	10	Q. But I'm really focused on the fusing
10:47:05	11	operation. Once you get in there and you have access to
10:47:08	12	the splice case in the splicing van --
1ŋ:47:10	13	A. Right.
1ʋ:47:10	14	Q. -- how many splices do you typically do at a
10:47:13	15	time?
10:47:16	16	A. It depends on the person who's doing it.
10:47:23	17	There's some lower than others.
10:47:25	18	Q. I'm talking about Mr. Tijerina.
10:47:29	19	A. If it was a single fusion, each one fiber, I
10:47:33	20	could probably do about 72 in a one day.
10:47:38	21	Q. Okay. So in that situation you would spend
10:47:42	22	your whole day at that manhole?
10:47:44	23	A. Right, right.
10:47:45	24	Q. That's a good example. If your DWO called for
47:50	25	you to fuse 144 fibers --

10:47:51 1	A.	Uh-huh.
47:52 2	Q.	-- you think you could get through about 72 in
10:47:54 3	a day?	
10:47:55 4	A.	Yes, sir.
10:47:55 5	Q.	So -- and that's an eight-hour shift?
10:47:58 6	A.	Yes, sir.
10:47:58 7	Q.	Taking an hour for lunch?
10:48:00 8	A.	Thirty minutes.
10:48:01 9	Q.	Thirty minutes for lunch?
10:48:06 10	A.	Yes, sir.
10:48:07 11	Q.	How many breaks?
10:48:10 12	A.	We ain't got nowhere to go once we set up.
10:48:14 13	Q.	So a good splicer can do 72 splices in a day?
10:48:18 14	A.	There might be some out there that can do
10:48:20 15	more. I don't know.	
10:48:22 16	Q.	I just need a ball park. Is that a yes?
10:48:26 17	A.	Yes.
10:49:24 18	Q.	One question I forgot, Mr. Tijerina. We
10:49:30 19	talked about an OT -- you testified earlier that an OTDR	
10:49:34 20	can be used to locate a fiber cut on a given length of	
10:49:39 21	fiber.	
10:49:39 22	A.	Yes, sir.
10:49:41 23	Q.	We also talked about occasions when SWBT fiber
10:49:46 24	is spliced to, say, Verizon fiber?	
49:49 25	A.	Right.

10:49:50	1	Q. My assumption is -- correct me if I'm wrong,
·49:54	2	if there were a fiber cut on that length of fiber that
10:49:58	3	had mixed ownership --
10:49:59	4	A. Uh-huh.
10:50:00	5	Q. -- could you still use an OTDR to determine
10:50:03	6	where that fiber cut was if you had access to both
10:50:07	7	termination points?
10:50:07	8	A. Yes, sir.
10:50:08	9	Q. So it doesn't matter who owns the fiber, the
10:50:11	10	OTDR will still work to determine the fiber cut; is that
10:50:15	11	correct?
10:50:15	12	A. Yes, sir.
1ᴖ:50:30	13	Q. Does the testing you do on fiber involve
1ᴜ:50:35	14	reflectance testing at all?
10:50:37	15	A. No.
10:50:38	16	Q. Okay. What is reflectance testing? I'm not
10:50:42	17	sure I understand that term.
10:50:47	18	A. I don't know. It's when you have a splice and
10:50:49	19	there's reflectance coming out of it back toward you.
10:50:53	20	Q. Right.
10:50:54	21	A. That's what the reflectance test is. Like a
10:51:00	22	DB loss will be good, but the reflectance is not.
10:51:04	23	Q. And you're -- and you're obviously focusing on
10:51:08	24	the splice point as opposed to the fiber itself, but
51:10	25	there are occasions, if I understand, where the light

10:51:13 1   going through will hit the splice and have too much

·51:17   2   reflection back into the fiber?

10:51:18 3   A.   Right.

10:51:19 4   Q.   That's what the reflectance problem would be?

10:51:23 5   A.   Right.

10:51:23 6   Q.   And in terms of being able to test for that,

10:51:26 7   how would you know if that were the case?

10:51:28 8   A.   I have no idea. I don't -- I have never done

10:51:31 9   it.

10:51:32 10   Q.   So the form you fill out and hand to the

10:51:35 11 engineer really just focuses on DB loss?

10:51:38 12   A.   Yes, sir.

10:51:38 13   Q.   And later on down the line someone else would

‿‿:51:41 14 do the reflectance testing?

10:51:43 15   A.   Probably.

10:51:44 16   Q.   Do you know what crews or what departments in

10:51:46 17 SWBT do the reflectance testing?

10:51:50 18   A.   No, sir.

10:51:50 19   Q.   It falls under the not-my-job category, right?

10:51:53 20   A.   I just do from one point to here and that's

10:51:56 21 it.

10:51:57 22   Q.   That's right, but see that got you promoted to

10:51:59 23 management, so you must have screwed up somewhere.

10:52:02 24   A.   I did it on the way.

52:19   25   MR. CRAWFORD: Give me just a second,

10:52:20	1	sir.
53:01	2	Q. A quick follow-up question. You mentioned
10:53:04	3	that SWBT's practice and policy for acceptable DB loss
10:53:11	4	at a splice was .2; is that correct?
10:53:13	5	A. Yes, sir.
10:53:15	6	Q. Has that standard changed over the last 20
10:53:19	7	years, to your knowledge?
10:53:20	8	A. No, sir.
10:53:21	9	Q. So to the best of your recollection, and you
10:53:24	10	spliced for 20 years, the .2 DB loss has been the set
10:53:30	11	standard for SWBT splices?
10:53:32	12	A. Yes, sir.
10:53:33	13	Q. Okay. And I'm curious how fast a splicer you
10:53:46	14	are. If you make a splice at a manhole on a fiber optic
10:53:51	15	cable, how long does it take you to make the splice once
10:53:54	16	you pull the fiber into the splicing van?
10:53:59	17	A. What do you mean? What do you mean by
10:54:05	18	splicing, splicing one fiber or --
10:54:08	19	Q. Single fiber. Obviously 72 would take longer
10:54:11	20	than one, but once you get a splice case pulled into the
10:54:19	21	splice van --
10:54:19	22	A. Uh-huh.
10:54:21	23	Q. -- and you're going to open that case and
10:54:25	24	splice a single dead count of fiber, how long is that
54:29	25	going to take you before you start to open the splice

10:54:33 1 case to when you're closing the splice case?

54:37 2   A.   Once it's inside the truck you mean?

10:54:40 3   Q.   Yes, sir.

10:54:41 4   A.   It all depends on what kind of trouble you

10:54:44 5 have with the fiber.

10:54:46 6   Q.   On average. Certainly there can be crazy

10:54:53 7 situations that would take longer, but --

10:54:55 8   A.   Once you put the cable in the truck, open it

10:54:57 9 up, get your fiber you need, set your equipment up --

10:55:03 10   Q.   Fuse, cap, put it back in the splice tray,

10:55:07 11 close the splice case, how long from opening the splice

10:55:10 12 case to closing the splice case?

10:55:14 13   A.   Anywhere from 30 minutes to an hour.

__:55:17 14   Q.   Okay. What's the fastest you've ever done it

10:55:20 15 in?

10:55:24 16   A.   I don't have any idea, not on a single fiber.

10:55:42 17   Q.   When you send your people out -- when you send

10:55:47 18 a splicer out to a manhole to do a splice on a splice

10:55:52 19 case, do you typically send one person or two?

10:55:57 20   A.   Two.

10:55:58 21   Q.   Is that always the case?

10:56:00 22   A.   Yes, sir.

10:56:00 23   Q.   Why is that?

10:56:01 24   A.   For one, safety, and the other one is, we've

56:06 25 got to send one person to the office to test while we do

10:56:09	1	the splice.
·56:10	2	Q. Okay. Do you know what's the most number of
10:56:21	3	fibers you've spliced in a single day, roughly?
10:56:27	4	A. Ninety-six.
10:56:30	5	Q. Ninety-six. Pretty good.
10:56:33	6	A. That's single fuse.
10:56:35	7	Q. What?
10:56:36	8	A. Nothing.
10:56:46	9	Q. Is it SWBT's policy when it deploys this fiber
10:56:55	10	out in the field to splice every fiber for end-to-end
10:57:05	11	connectivity at the time it's deployed?
10:57:09	12	A. What do you mean?
10:57:10	13	Q. When SWBT is deploying its fiber out in the
₁ᵤ:57:16	14	field, is it the policy of SWBT to at that time splice
10:57:21	15	all fiber for end-to-end connectivity?
10:57:25	16	MR. HARTLEY: Object, form.
10:57:25	17	A. Yes, sir.
10:57:32	18	Q. Well, maybe you didn't understand my question.
10:57:36	19	If you have to go out there and splice --
10:57:40	20	A. Uh-huh.
10:57:40	21	Q. -- if this crew goes out and splices every
10:57:44	22	night, obviously those fibers weren't spliced together
10:57:47	23	when they were put in the ground, were they?
10:57:50	24	A. Well, it depends. It depends where we have
57:55	25	got to go into to get the fibers.

10:58:02   1   Q.   Right.   So every -- this crew that goes out

·58:04   2   and splices fiber --

10:58:05   3   A.   Uh-huh.

10:58:06   4   Q.   -- if they're opening up a splice case --

         5   A.   Right.

10:58:09   6   Q.   -- most of the time there's working fiber in

10:58:11   7   there and there's non-working fiber in there, correct?

10:58:14   8   A.   Yes.

10:58:15   9   Q.   And they're going to splice the non-working

10:58:18 10   fiber together to call it into service, right?   That's

10:58:22 11   their job?

10:58:22 12   A.   Yes.

10:58:23 13   Q.   So obviously when that fiber was put in the

ᴊᴜ:58:27 14   ground, it wasn't spliced together at that point in

10:58:30 15   time?

10:58:32 16   A.   It could have been spliced going straight

10:58:35 17   through, but then they turn a different direction and we

10:58:41 18   had to reroute the fibers.

10:58:44 19   Q.   Excellent point, Mr. Tijerina.   There are

10:58:47 20   certain times when your splicers are going out and

10:58:51 21   they're breaking splices and to -- to then resplice two

10:58:54 22   different fibers together.   Like, they may take a fiber

10:58:57 23   and break the splice and then splice one half to a new

10:59:03 24   fiber as opposed to the old fiber, correct?

.59:05 25   A.   Yes, reroute them a different direction.

10:59:08 1   Q.   That's how you reroute fiber, correct?

59:10 2   A.   Yes, sir.

10:59:11 3   Q.   But the vast majority of the time they're not

10:59:13 4   going out there to break splices. They are going out

10:59:17 5   there to make splices, correct?

10:59:23 6   A.   To reroute fibers.

10:59:25 7   Q.   Certainly. When they break them, they reroute

10:59:28 8   them, right?

10:59:30 9   When you open up -- when your crews open

10:59:33 10 up a splice case of, say, 144 fiber count --

10:59:37 11   A.   Uh-huh.

10:59:38 12   Q.   -- how many of those will typically already be

10:59:44 13 spliced together?

10:59:46 14   A.   It depends where the splice is.

10:59:52 15   Q.   Well, the splice is in the splice case, right?

10:59:55 16   A.   Yeah, but I mean, the location of the splice.

10:59:59 17 Sometimes the fiber will be downsized as we go out of

11:00:04 18 the office.

11:00:06 19   Q.   Okay. That's a good point. Let's back up.

11:00:08 20   The fiber that leaves the CO typically

11:00:15 21 has a high count, correct?

11:00:16 22   A.   Yes, sir.

11:00:17 23   Q.   Like a 288?

11:00:18 24   A.   Yes, sir.

00:19 25   Q.   And it will go out into the middle of a

11:00:22 1 neighborhood or business area, correct?

00:24 2   A.   Not necessarily.

11:00:26 3   Q.   Or it will head out into a certain direction,

11:00:30 4 correct?

11:00:30 5   A.   Yes.

11:00:30 6   Q.   And that 288 will intersect with various

11:00:36 7 smaller cables that feed into, say, buildings at various

11:00:43 8 manholes, correct?

11:00:44 9   A.   Sometimes.

11:00:44 10   Q.   So if there's one building on the way, there

11:00:46 11 may be a 24-count cable that connects to that building

11:00:50 12 and you would go and fuse some of those 24-count to some

11:00:54 13 of the 288-count to make connectivity?

11:00:57 14   A.   Yes, sir.

11:00:59 15   Q.   And then the remainder of whatever is left of

11:01:01 16 the 288 will continue on and some may splice off again

11:01:04 17 to another --

11:01:05 18   A.   Right.

11:01:06 19   Q.   -- feeder cable for another building, correct?

11:01:08 20   A.   Right.

11:01:10 21   Q.   What do you call that main cable that leaves

11:01:14 22 the building?

11:01:15 23   A.   The feeder cable or the backbone fiber.

11:01:19 24   Q.   The backbone fiber. I've heard backbone

01:22 25 fiber. Is that a term you guys use in the field?

11:01:25 1   A.   Yes, sir.

·01:26   2   Q.   And the smaller cable that has a lesser number

11:01:28 3   of fibers that connects to a multitenant building or

11:01:31 4   just a building, what is that smaller offshoot fiber

11:01:36 5   called?

11:01:36 6   A.   We call it fiber connect or -- fiber connect

11:01:40 7   fiber or cable that connects to the backbone.

11:01:43 8   Q.   Fiber connect, and that's --

11:01:45 9   A.   Cable.

11:01:45 10   Q.   Fiber connect cable.

11:01:47 11   Do you call it feeder or distributor --

11:01:53 12   A.   Distribution.

11:01:55 13   Q.   Distribution cable. Can I use the term

⊥⊥:01:59 14   distribution cable? Do you understand that?

11:02:01 15   A.   Yes.

11:02:02 16   Q.   So the distribution cables that connect to the

11:02:04 17   buildings typically have a lower count than the backbone

11:02:08 18   cable?

11:02:08 19   A.   Yes, sir.

11:02:08 20   Q.   And at various manholes you'll connect --

11:02:12 21   you'll splice the distribution cable fibers to the

11:02:15 22   backbone cable fibers on an as-needed basis, right?

11:02:18 23   A.   Yes, sir.

11:02:19 24   Q.   When they deploy that 24-count distribution

02:24 25   cable to a building, they don't automatically splice

11:02:32 1 all 24 fibers into the backbone fiber at that time, do

·02:36 2 they?

11:02:36 3   A.   No, sir.

11:02:37 4   Q.   That's not SWBT's policy?

11:02:42 5   A.   (Shakes head).

11:02:42 6   Q.   And that helps me, because I was trying to

11:02:44 7 understand that.

11:02:45 8   A.   Uh-huh.

11:02:45 9   Q.   It's not SWBT's policy when it deploys

11:02:49 10 backbone cable and distribution cable to splice all

11:02:52 11 fibers together for end-to-end connectivity back from

11:02:56 12 the building to the CO?

11:02:57 13   A.   No, sir.

⊥⊥:02:58 14   Q.   And why is that not SWBT's policy?

11:03:01 15   A.   I have no idea.

11:03:02 16   Q.   Does that make sense to you not to do it?

11:03:08 17 Does it make sense to you to only splice fiber on an

11:03:17 18 as-needed basis?

11:03:17 19   A.   I don't know.

11:03:19 20   Q.   Well, if it's not SWBT's policy to splice

11:03:23 21 together all fibers for end-to-end connectivity at the

11:03:30 22 time fiber is placed in the field, is it then SWBT's

11:03:37 23 policy to splice the fibers together when they're called

11:03:40 24 into service?

03:44 25   A.   Can you repeat the question, please?

11:03:49 1   Q.   You've -- you're telling me that it's not

03:51 2 SWBT's policy to splice all fibers together at the time

11:03:56 3 they are deployed in the field, correct? That's not

11:04:00 4 SWBT's policy?

11:04:01 5   A.   To the distribution or to the backbone?

11:04:08 6   Q.   You've told me that on a route from the CO to

11:04:11 7 a customer building --

11:04:12 8   A.   Uh-huh.

11:04:13 9   Q.   -- that involves backbone fiber and

11:04:17 10 distribution fiber?

11:04:17 11   A.   Right.

11:04:18 12   Q.   At the time they just deploy the distribution

11:04:21 13 fiber and the backbone fiber in the field --

11:04:23 14   A.   Uh-huh.

11:04:23 15   Q.   -- is it SWBT's policy to diffuse all

11:04:28 16 distribution fibers into the backbone fiber at that

11:04:30 17 time?

11:04:31 18   A.   If the backbone fiber just goes out there,

11:04:33 19 there's no distribution at all, just backbone fiber,

11:04:38 20 sometimes they'll downsize it as they go out. They go

11:04:43 21 from a 288 to 144. Well, we keep on splicing just the

11:04:49 22 count that's going to go straight through and the

11:04:52 23 rest we leave a dead count in the splice. So if they

11:04:57 24 have a 288 and they downsize to a 216, we splice 216.

05:02 25 The other 72 are left dead in the splice. We go by what

11:05:09 1 our work order calls for us to do.

 05:12 2   Q.   Let me follow-up on that. If SWBT deploys a

11:05:17 3 backbone fiber of 288 fiber count --

11:05:20 4   A.   Uh-huh.

11:05:20 5   Q.   -- and it's going to run from the CO to

11:05:23 6 manhole 78 --

11:05:24 7   A.   Right.

11:05:26 8   Q.   -- on a regular basis, SWBT does not splice

11:05:31 9 all 288 fibers all the way to that end manhole, correct?

11:05:39 10   A.   I don't follow you.

11:05:40 11   Q.   I got us confused. Let me switch it around.

11:05:45 12 If SWBT is going to deploy a 288 fiber count from the

11:05:50 13 central office to, say, manhole 78 --

⊥⊥:05:52 14   A.   Right.

11:05:53 15   Q.   -- does it typically splice through all 288

11:05:56 16 fibers to that manhole, or does it leave many unspliced

11:06:02 17 all the way through?

11:06:04 18   A.   We splice what the print calls for. They tell

11:06:08 19 us -- if our work print shows 288 splices, we splice

11:06:13 20 288.

11:06:14 21   Q.   Right. How often do you splice through all

11:06:19 22 fibers in a fiber cable all the way through? How often

11:06:24 23 does the DWO call for that?

11:06:30 24   A.   Well, for a customer or for -- I don't

 06:33 25 understand the question. I don't --

11:06:36 1   Q.   Okay. Is it normal to have dead count in the

06:43 2 splice case?

11:06:46 3   A.   Yes.

11:06:50 4   Q.   Why is that?

11:06:50 5   A.   Because they might have taken fibers somewhere

11:06:56 6 else and left the count dead.

11:07:30 7   Q.   So I go back to my example. If SWBT has a

11:07:38 8 distribution cable of 24 fiber count to a building, if

11:07:40 9 they deploy that 24 fiber count into the ground --

11:07:44 10   A.   Uh-huh.

11:07:44 11   Q.   -- is it normal for them to at that time of

11:07:48 12 deployment splice all 24 fibers into the backbone fiber

11:07:53 13 at that time?

11:07:54 14   A.   No, just what they're going to need in the

11:07:58 15 building. If they need four fibers, four fibers.

11:08:01 16   Q.   That's all I was trying to understand. SWBT's

11:08:04 17 policy is to splice the fibers they need at the time for

11:08:08 18 customer service at that time?

11:08:10 19   A.   Yes, sir.

11:08:10 20   Q.   They don't go and splice all fibers if they

11:08:14 21 don't have a customer needing the service at that time?

11:08:17 22   A.   Right.

11:08:17 23   Q.   And that is why there's so many fibers out in

11:08:21 24 the field that are unspliced?

08:23 25   A.   Right.

11:08:23	1	Q. Now, the minute they need it for a customer,
08:25	2	then they will go and splice that fiber and create
11:08:29	3	end-to-end connectivity for that customer?
11:08:31	4	A. Yes, sir.
11:08:31	5	Q. And I'm using the example of a CO to a
11:08:35	6	customer building.
11:08:35	7	A. Right.
11:08:36	8	Q. But if they have a 24-count fiber to that
11:08:39	9	building and the customers are only using four fibers --
11:08:42	10	A. Uh-huh.
11:08:43	11	Q. -- they don't splice the other 20, do they?
11:08:45	12	A. No, sir.
11:08:46	13	Q. That's not SWBT's policy, is it?
11:08:49	14	A. No, sir.
11:08:50	15	Q. They don't want you to go splice stuff unless
11:08:53	16	the customer needs it, correct?
11:08:54	17	A. Right.
11:08:54	18	Q. And when they deploy that route, at some point
11:08:59	19	that 24-count fiber has to feed into a backbone fiber
11:09:02	20	typically, right?
11:09:03	21	A. Yes, sir.
11:09:03	22	Q. And so in that situation they've spliced four
11:09:09	23	fibers to the backbone fiber and left the other 20 as
11:09:13	24	dead count unspliced to the backbone fiber, correct?
09:17	25	A. Right.

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11:09:17  1        Q.    And that's a typical situation you see in the

   09:20  2    field?

11:09:21  3        A.    Yes, sir.

11:09:39  4        Q.    If I talked about a loop, what is your

11:09:43  5    definition of a loop?  Do you hear that terminology in

11:09:46  6    the field at all?

11:09:47  7        A.    Yes, sir.

11:09:47  8        Q.    What does a loop mean to you?

11:09:49  9        A.    It depends on what -- what kind of loop you're

11:09:54 10    talking about.

11:09:54 11        Q.    What kind of loops are there?

11:09:56 12        A.    Well, if you're talking about a -- a loop on a

11:10:05 13    system for a customer, they're in a loop.  Are you

11:10:08 14    talking about a loop in -- a cable loop in the manhole?

11:10:11 15        Q.    Right, right, I understand.

11:10:13 16                    Not a coil, but when I talk about loop, I

11:10:19 17    mean a circuit path or a fiber path --

11:10:21 18        A.    Right.

11:10:22 19        Q.    -- generally from the CO to a customer prem.

11:10:25 20        A.    Right.

11:10:25 21        Q.    Is that your understanding of the term loop?

11:10:27 22        A.    Sometimes, yes, we use that term.

11:10:32 23        Q.    And I say CO; it could just be any type of

11:10:38 24    wire center, correct?

   10:39 25        A.    Yes.
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11:10:40	1	Q. One definition of loop is when the fiber path
10:42	2	is from the -- from a wire center to a customer premise,
11:10:50	3	correct?
11:10:50	4	A. Right.
11:10:55	5	Q. Does it matter to you in your job whether or a
11:10:58	6	wire center is deemed a primary wire center or a
11:11:03	7	secondary wire center?
11:11:05	8	MR. HARTLEY: Object to form.
11:11:07	9	A. What do you mean?
11:11:08	10	Q. Have you heard the word primary wire center?
11:11:10	11	A. Yes, sir.
11:11:11	12	Q. What is a primary wire center and what is a
11:11:15	13	secondary wire center?
11:11:16	14	A. The primary wire center, to my understanding,
11:11:19	15	is the primary office where the customer is at -- or the
11:11:23	16	town where the customer is at. The central office is
11:11:27	17	the primary office or the serving wire center.
11:11:31	18	Q. Right. From an equipment standpoint, is there
11:11:36	19	any difference between a serving wire center and a
11:11:39	20	different secondary wire center? Do they have the same
11:11:45	21	type of equipment in them, all wire centers?
11:11:48	22	A. Basically, yes.
11:11:53	23	Q. Have you ever spliced to create a route to a
11:11:58	24	secondary wire center before?
12:00	25	A. Yes, sir.

11:12:02	1	Q. Why do you do that?
12:06	2	A. Because a customer requests a secondary
11:12:10	3	central office.
11:12:11	4	Q. When do customers do that? Are there certain
11:12:16	5	customers that do that more than others or why do they
11:12:19	6	do that?
11:12:20	7	A. Some customers want two central office
11:12:24	8	protection instead of one.
11:12:25	9	Q. They call that diversity?
11:12:28	10	A. Yes, sir.
11:12:28	11	Q. And diversity is when -- is that like on a
11:12:31	12	SONET ring?
11:12:33	13	A. Yes, sir.
11:12:34	14	Q. You'll have one path going to one CO and
11:12:37	15	another path going to another CO?
11:12:39	16	A. Yes, sir.
11:12:40	17	Q. Is that important for some customers?
11:12:42	18	A. Yes, sir.
11:12:42	19	Q. Why is that?
11:12:43	20	A. In case something happens to the fiber or to
11:12:46	21	the central office.
11:12:47	22	Q. They're protected?
11:12:48	23	A. Yes, sir.
11:12:48	24	Q. Do you do that a fair amount?
12:51	25	A. Yes, sir.

11:13:01	1	Q. Have you ever established a route to a
·13:05	2	secondary wire center from a customer premise when there
11:13:09	3	was no connecting route to the primary wire center or
11:13:14	4	the serving wire center that you know of?
11:13:17	5	A. I don't understand.
11:13:18	6	Q. Have you ever been asked to connect fiber from
11:13:22	7	a customer prem to a secondary wire center when -- when
11:13:29	8	you looked at the records, you never saw a route to the
11:13:32	9	primary wire center, the serving wire center?
11:13:36	10	A. Not that I can remember I haven't, no.
11:13:37	11	Q. Okay. Not that you know, right?
11:13:39	12	A. Right.
11:13:40	13	Q. You don't recall?
11:13:41	14	A. Huh-uh.
11:13:47	15	Q. What is an entrance facility? I've heard that
11:13:49	16	term.
11:13:50	17	A. It's the way, I guess, the cable goes into a
11:13:54	18	building.
11:14:25	19	MR. CRAWFORD: Take a quick break.
11:14:38	20	(Recess 11:14 to 11:23 a.m.)
11:24:01	21	Q. Mr. Tijerina, we talked about making splices.
11:24:05	22	Sometimes you splice fiber along a route to a serving
11:24:11	23	wire center and sometimes you make splices along a route
11:24:14	24	in a manhole to a secondary wire center, correct?
.24:17	25	A. Uh-huh.

11:24:17	1	Q. Do those splices differ in any way from an
24:20	2	equipment standpoint, a labor standpoint, a quality
11:24:23	3	standards standpoint, or are they the same splice to the
11:24:28	4	same standards?
11:24:28	5	A. They are the same splice. They are the same,
11:24:31	6	you know -- they are made the same -- to the same
11:24:34	7	standards.
11:24:35	8	Q. You don't care where the fiber goes, you're
11:24:38	9	going to do the same splice no matter what?
11:24:40	10	A. Yes, sir.
11:24:40	11	Q. And that splice has to meet the same minimum
11:24:43	12	DB threshold?
11:24:45	13	A. Yes, sir.
11:24:45	14	Q. And then we also talked about the times you go
11:24:50	15	into a splice case and you have to break a splice to
11:24:53	16	reroute the fiber to a different ending fiber.
11:24:57	17	A. Yes, sir.
11:24:58	18	Q. Correct?
11:24:59	19	A. Uh-huh.
11:25:01	20	Q. Does that happen weekly or daily or monthly?
11:25:10	21	A. Well, it happens weekly.
11:25:12	22	Q. So your crews are out there breaking splices
11:25:15	23	and rerouting fibers with different splices every week?
11:25:20	24	A. Yes.
25:21	25	Q. Okay. If somebody tells you they're going to

11:25:24	1	go break a splice, you don't freak out, do you?
25:27	2	A. Well, I look at the print.
11:25:29	3	Q. That's an acceptable procedure within SWBT's
11:25:32	4	policy, right?
11:25:33	5	A. Yes, sir.
11:25:33	6	Q. In fact, you're ordered to go break the
11:25:36	7	splice, right?
11:25:37	8	A. Our work requests --
11:25:39	9	Q. Tell you to break the splice?
11:25:41	10	A. Yes, sir.
11:25:41	11	Q. And by breaking the splice, that's just, you
11:25:44	12	know, like snipping it with the scissors, right, a pair
	13	of scissors?
11:25:50	14	A. It's not working fiber. It's not working
11:25:54	15	fiber.
11:25:54	16	Q. Well, of course, it used to be working fiber,
11:25:57	17	right, which is why it --
	18	A. No, sir.
11:25:59	19	Q. -- it had been spliced before?
11:26:00	20	A. No, sir.
11:26:00	21	Q. If fiber has already been spliced together --
11:26:03	22	if you go in the splice case and you see two fibers that
11:26:08	23	have been spliced together, they have been spliced
11:26:10	24	together for a reason, correct?
26:14	25	A. Yes.

11:26:14 1   Q.   At one point -- at one time service may have

·26:19 2   been -- service may have been running over that fiber,

11:26:23 3   correct?

11:26:23 4   A.   At one time, yes.

11:26:24 5   Q.   You don't know?

11:26:25 6   A.   Yes, we do.

11:26:26 7   Q.   You do know?

11:26:27 8   A.   Yes, sir.

11:26:28 9   Q.   So if it has been spliced in the past, to your

11:26:31 10   understanding, that means service at one point existed

11:26:34 11   over that fiber?

11:26:35 12   A.   Yes, sir.

11:26:35 13   Q.   And is that because you don't splice unless

⊥⊥:26:37 14   you need to call it into service?

11:26:41 15   A.   I don't understand.   .

11:26:42 16   Q.   Is that how you know?

11:26:43 17   A.   We should go to the central -- we go to

11:26:48 18   central office and check for working fibers before we do

11:26:51 19   anything else.

11:26:52 20   Q.   Right. And you make sure that the fiber

11:26:58 21   you're going to work on is not working?

11:27:00 22   A.   Yes, sir.

11:27:00 23   Q.   Because you don't want to cut into something

11:27:02 24   that has light going through it?

27:04 25   A.   Right.